

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )  
 )  
Administration of the ) CC Docket No. 92-237  
North American Numbering Plan )

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**REPLY COMMENTS OF GTE**

GTE Service Corporation ("GTE"), on behalf of its affiliated domestic telephone operating and wireless companies, hereby submits its reply to comments regarding whether the appropriate length for the transition (permissive dialing period) from three to four-digit Carrier Identification Codes ("CICs") has been affected by the passage of the Telecommunications Act of 1996 ("1996 Act").<sup>1</sup>

**I. NOT A SINGLE FACT WAS PRESENTED IN SUPPORT OF A SIX YEAR TRANSITION PERIOD.**

When the Commission first raised the issue of the appropriate length for the transition from three- to four-digit Carrier Identification Codes ("CICs") two years ago, numerous parties holding three-digit CICs not surprisingly argued for the longest transition period possible.<sup>2</sup> The comments filed on May 21, 1996, demonstrate that very little has changed. AT&T continues to urge the

<sup>1</sup> Public Notice, DA 96-678 (released April 30, 1996).

<sup>2</sup> See, e.g., June 30, 1994, Comments of APCC at p. 4 (arguing for a 12-year transition period).

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Commission to stay with its proposed six-year transition period because the conversion will require "an extensive modification effort at significant cost." (AT&T at 6.) It is notable that AT&T offers no facts to support its cost estimates nor does it offer any status report as to what has taken place over the last two years in this regard; what efforts have been made to notify affected customers; how many customers have begun the modification process, etc. In this factual vacuum, it is impossible for the Commission to determine the veracity of AT&T's claims. Arguments by other parties are no more persuasive.

VarTec's assertion that the expected increase in demand for CICs substantiates the need for a transition of "six years or longer" in order to avoid customer confusion is, at best, curious.<sup>3</sup> (VarTec at 1.) Customer confusion can best be avoided by ending the transition sooner rather than later. It is illogical to allow customers a longer time to become accustomed to a feature that is destined to change. Logic would dictate that customers be acclimated to the new codes as soon as possible. VarTec also argues that it will be expensive and time-consuming (up to seven years) to notify its customer base. (VarTec at 2.) As with AT&T, VarTec offers no facts to support this claim or to demonstrate the efforts it has undertaken in the last two years, if any, to complete this effort.

The absence of facts to support a long transition period is consistent with GTE's position that there is no compelling reason to continue the transition

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<sup>3</sup> Telco Communications Group, Inc. ("Telco") (at 5-6) makes a similar claim to buttress its argument for a 12-year transition period that would only begin when a final decision is reached on this issue. As the Commission correctly notes, however, the transition has begun. Thus, there is no

beyond December of this year. Other local exchange carriers unanimously agree that the transition period must be shorter than six years.<sup>4</sup> Even MCI acknowledges that the permissive dialing period must end after the 5XXX and 6XXX CICs have all been assigned. (MCI at 2.) With the growing demand for CICs, exhaustion will occur long before a six year transition ends.

Finally, the suggestion by AT&T (at 5) and Telco (at 7) that the dialing disparity between three- and four-digit CICs will not prejudice new entrants is incredible given the competitive concerns consistently espoused from every corner in support of dialing parity. AT&T believes that once carriers are presubscribed, Carrier Access Codes ("CACs") "should become less significant" because callers will rely more often on their chosen carriers. (AT&T at 5.) If anything, this reasoning suggests that the disparity between five- and seven-digit CACs will become even more significant as carriers battle for the presumably smaller and ever decreasing number of customers inclined to "dial around."

Telco simply dismisses the argument that carriers assigned four-digit CICs will be competitively disadvantaged on the grounds that "any such 'disadvantage' has not been quantified to date." (Telco at 7.) Telco then goes on to argue that in any event this unquantified disadvantage is not sufficient to "override the administrative costs" to companies such as Telco that rely on their existing CICs. (*Id.*) Telco fails to explain, however, how it is able to conclude that

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logical reason to adopt the fiction that it will only begin after the Commission has issued a decision in this proceeding.

<sup>4</sup> See BellSouth at 2 (December 31, 1997); Bell Atlantic (one year); Cincinnati Bell (February 1997); NYNEX at 5 (April 1, 1997); Pacific Bell at

"administrative costs" outweigh a disadvantage that it contends has not been quantified.

**II. THERE IS A CONSENSUS THAT THE COMMISSION'S RESTRICTION ON CIC ASSIGNMENTS MUST BE LIFTED**

There is unanimity among the parties commenting on the issue that the Commission's one-CIC-per-applicant restriction must be lifted.<sup>5</sup> GTE does not agree with MCI's suggestion, however, that the Commission should discourage other uses of CICs in order to conserve the remaining number of four-digit 5XXX and 6XXX CICs. (MCI at 3.) Innovation should not be sacrificed in order to provide an unnecessarily long transition period that will only provide a competitive advantage to those companies holding three-digit CICs.

**III. CONCLUSION**

The complete lack of factual support for a transition period of six years or longer supports GTE's assertion that there really is no reason for such a long period. The transition should end on December 31, 1996 (or at the very latest, one year from now) in order to free up other four-digit CICs and avoid

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6 (one year); SBC at 4 (December 31, 1996); U S WEST at 5 (December 31, 1996).

<sup>5</sup> See U S WEST at 2, SBC at 3, GTE at 3, Pacific Bell at 3, BellSouth at 4, AT&T at 3.

competitive disadvantages to new entrants. Finally, there is no dispute regarding the need to lift the current restriction on CIC assignments.

Respectfully submitted,

GTE Service Corporation,  
on behalf of its affiliated domestic  
telephone operating and wireless  
companies

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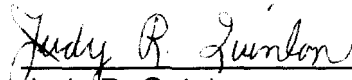
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May 28, 1996

ITS ATTORNEY

### **Certificate of Service**

I, Judy R. Quinlan, hereby certify that copies of the foregoing "Reply Comments of GTE" have been mailed by first class United States mail, postage prepaid, on May 28, 1996 to all parties of record.

  
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Judy R. Quinlan